

**REMARKS**

Claims 23-34, 37-44, 46-53, 55-62, 65-96 and 100-107 are pending in the application.

Claims 23-34, 37-44, 46-53, 55-62, 65-96 and 100-107 have been rejected.

Claims 23, 24, 27-29, 37, 38, 41-43, 46, 47, 49-52, 55, 56, 59-61, 65, 66, 69-71, 73, 74, 77-79, 81, 82, 85-87, 89, 90, 93-95, and 100-103 have been amended. No new matter has been added. Support for these claim amendments can be found, at least, in p. 14, l. 22-p. 19, l. 24 of the originally-filed Application.

Claims 68, 76, 84, and 92 have been cancelled.

**Formal Matters**

Applicants filed an Information Disclosure Statement on May 4, 2005 which has not yet been considered by the Examiner. Applicants are resubmitting the Information Disclosure Statement with this filing and respectfully request the Examiner's consideration.

**Examiner Interview**

Applicants would also like to thank Examiner Bruckart for the interview conducted on October 23, 2009. Applicants believe the amendments and discussions below to be in accord with the discussions presented at the interview.

Rejection of Claims under 35 U.S.C. § 103(a)

Claims 23-96 and 100-107 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6, 722,216 issued to Ankireddipally et al. (“Ank”) in view of U.S. Patent Publication No. 2001/0024497 listing Campbell et al. as inventors (“Campbell”) and further in view of U.S. Patent 6,185,288 issued to Wong (“Wong”). Applicants respectfully traverse this rejection.

Claim 23, as amended, is representative of amended independent Claims 37, 46, and 55, and recites as follows:

23. A method comprising:
  - receiving an incoming customer support request at a channel driver, wherein said channel driver is in communication with a communications channel, a media type of said communications channel is one of a plurality of media types, and
  - said channel driver is configured to communicate with said communications channel using said media type;
  - in response to said receiving said incoming customer support request, forming a message, wherein
  - said forming comprises
    - inserting customer relations management system information into said message, and
    - configuring said message to be communicated to a communication server by encoding at least a portion of said message in a standard format, wherein
    - said standard format is independent of said media type of said communication channel,
    - said standard format conforms to a data format specification,
    - said communication server and said channel driver are configured to recognize said standard format, and
    - said data format specification defines a plurality of interactions between said communication server and said channel driver;
  - communicating said message between said communication server and said channel driver, wherein
  - said message is configured to transport said customer relations management system information between said communication server and said channel driver, and

said communicating is performed according to said data format specification;  
 receiving said message at said communication server, wherein  
   said communication server receives said message from said channel driver,  
   said receiving is performed in a media-independent manner by virtue of said communication server and said channel driver being configured to communicate according to said data format specification, and  
   said communication server and said channel driver being configured to communicate according to said data format specification allows said communication server and said channel driver to be configured separately; and  
 causing said communication server to route said incoming customer support request to an agent, wherein  
   said communication server is configured to route said incoming customer support request to said agent by virtue of being configured to route said customer relations management system information to a browser coupled to said agent,  
   said causing routes said incoming customer support request to said agent as a work item,  
   said causing comprises pushing said customer relations management system information from said communication server in response to said receiving said message,  
   said customer relations management system information comprises at least one of agent information and work item information,  
   said agent information comprises information regarding a skill set of an agent, and  
   said work item information comprises information regarding a task to be performed by said agent.

The Office Action relies on Ank, Campbell, and Wong, in combination, to reject Claim 23. *See* Office Action, pp. 3-5. But Applicants respectfully submit that Ank, Campbell, and Wong, alone or in combination, fail to show, teach or even suggest the limitations of Claim 23, as amended.

First, the cited sections of Ank, Campbell, and Wong fail to show, teach, or even suggest configuring a message to be communicated to a communication server by encoding at least a portion of the message in a standard format that is independent of a

media type of a communications channel and conforms to a data format specification recognizable by both the communication server and the channel driver. The Office Action attempts to equate Ank's disclosure of a message encoded in XML and being transmitted, with the claimed configuring operation. *See* Office Action, p. 3. However, among other failings, the cited sections of Ank fail to teach or suggest that a message is encoded according to a standard format which is media-independent and conforms to a data format specification recognizable by both a communication server and a channel driver. Instead, the cited sections of Ank simply provide that XML messages are machine-readable and can be interpreted in a domain-specific fashion. But, simply encoding a message in XML and interpreting the message in a domain-specific fashion does not teach or suggest encoding a message according to a media-independent format, which also conforms to a data format specification recognizable by both a communication server and a channel driver. Therefore, the cited sections of Ank fail to show, teach, or even suggest the claimed configuring operation.

In addition, the cited sections of Campbell and Wong fail to show, teach, or even suggest the claimed configuring operation. Indeed, the Office Action has (concretely) not relied upon these references to disclose the claimed configuring operation. *See* Office Action, pp. 3-4. This is because the cited sections of Campbell and Wong fail to teach or suggest media-independent communication between a communication server and a channel driver.

Furthermore, the cited sections of Ank, Campbell, and Wong, alone or in combination, fail to show, teach, or even suggest a system where communicating and receiving operations performed between a communication server and a channel driver are

performed in a media-independent manner, given that both components are configured to communicate according to the same data format specification. The cited sections of Campbell provide a customer communication service system for servicing multimedia customer communications to agents. *See* Campbell, Abstract. The cited sections of Wong provide a method for performing call signaling for multimedia call setups. *See* Wong, Abstract. However, among other failing, the cited references fail to teach or suggest communicating between a communication server and a channel driver, and, in particular, such communications that are had in a media-independent manner. Further, the references fail to even recognize that such components might somehow be configured according to a data format specification that recognizes the standard format used for encoding messages. Similarly, neither reference teaches nor suggests that the data format specification used to configure the communication server and the channel driver defines a plurality of interactions between the communication server and the channel driver, allowing for separate configuration of the communication server and the channel driver.

For at least these reasons, Applicants respectfully submit that neither Ank, Campbell, nor Wong, alone or in combination, disclose all the limitations of Claims 23, 37, 46, and 55, and all claims depending therefrom, and that these Claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

In addition, amended Claim 65, which is representative of Claims 73, 81, and 89, provides limitations that are similar to those in Claim 23. For at least the reasons presented above for the allowance of Claim 23, Applicants respectfully request the

reconsideration and withdrawal of the rejection to Claims 65, 73, 81, 89, and all claims dependent therefrom, and an indication of the allowability of same.

### **CONCLUSION**

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5094.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

*Ana G. Luther*

Ana G. Luther  
Attorney for Applicants  
Reg. No. 61,704  
Telephone: (512) 439-5094  
Facsimile: (512) 439-5099